

UNITED STATES DISTRICT COURT  
for the  
WESTERN DISTRICT OF MISSOURI

Thomas R. McLean, MD and	)	
Third Millennium Consultants, LLC	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. #4:20-CV-593-BP
	)	
Jeffery W Bruce, Esq. and	)	
Does #1 to #50	)	
	)	
Defendant.	)	

**PLAINTIFF'S AFFIDAVIT ON DAMAGES**

The Plaintiff makes the following sworn statements concerning the damages he sustained because of the Defendant's professional negligence, breach of contract, and intentional infliction of emotional distress:

1. I am 64 years old; and in excellent health.
  - a. The only medications that I take are lovastatin (for hypercholesterolemia) and one aspirin per day.
  - b. I have never smoked.
  - c. I exercise
    - i. Six days per week; and
    - ii. Have done so for the past four decades.
  - d. I have a "type A" personality; and always planned to work until death.
  - e. According to Social Security Administration (SSA),
    - i. I have another 20.5 years to live.<sup>1</sup>
    - ii. The SSA's data includes "all comers;" so it is reasonable to believe my life expectancy will be greater than 20.5 years.
2. Contract Value: \$60,000.00. See Exhibit I and II.
3. Attorney fees \$31,750.00 (at present). See Exhibit II and III.

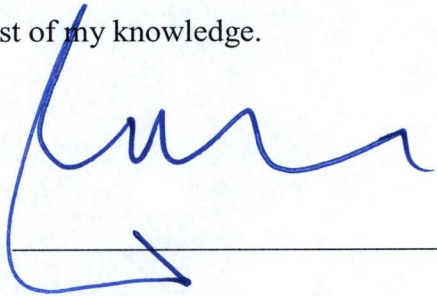
<sup>1</sup> 2017 Actuarial Life Table (most recent year data available); <https://www.ssa.gov/oact/STATS/table4c6.html> (September 1, 2020).

4. Expenses: \$1000.00 (*see* Exhibit II).
5. Medical Premiums: \$56,000.00 (*see* Exhibit II).
6. Net loss of income (*see* Exhibit II):
  - a. Presently is \$975,036.00.
  - b. If I work to age 70 is \$1,787,566.00.
7. Net Thrift Savings Plan losses (*see* Exhibit II):
  - a. Presently is \$500,000.00.
  - b. If I work to age 70 is \$1,787,566.
8. Lost Federal Employees Retirement System Benefits (*see* Exhibit II):
  - a. Presently is \$111,000.00
  - b. If I work to age 70 is \$789,000.00
9. Reputational Damages: \$1M.
10. Pain and Suffering \$500,000.00.
11. Punitive Damages: Depend on the above.
12. The total Damages,
  - a. Are itemized in Exhibit IV.
  - b. Using the most conservative figures (*see* Exhibit II), the total damage are between \$3.4M and \$6.7M.

[Intentionally Left Blank]

I declare under penalty of perjury under the laws of the United States and Kansas that the foregoing statements are true and accurate to the best of my knowledge.

September 1, 2020




---

Thomas R. McLean, Plaintiff pro se

4970 Park  
Shawnee, KS, 66216  
913-525-5526  
tmcllc1999@gmail.com

Subscribed and sworn to before me

this 1<sup>st</sup> day of September, 2020



---

Maria Victoria Portuguez

Notary Public, Johnson County, KS

My Commission Expires: July 12, 2021



UNITED STATES DISTRICT COURT  
for the  
WESTERN DISTRICT OF MISSOURI

Thomas R. McLean, MD and	)	
Third Millennium Consultants, LLC	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. #4:20-CV-593-BP
	)	
Jeffery W Bruce, Esq. and	)	
Does #1 to #50	)	
	)	
Defendant.	)	

**PLAINTIFF'S AMENDED AFFIDAVIT ON DAMAGES**

The Plaintiff makes the following sworn statements concerning the damages he sustained because of the Defendant's professional negligence, breach of contract, and intentional infliction of emotional distress:

1. I am 64 years old; and in excellent health.
  - a. The only medications that I take are lovastatin (for hypercholesterolemia) and one aspirin per day.
  - b. I have never smoked.
  - c. I exercise
    - i. Six days per week; and
    - ii. Have done so for the past four decades.
  - d. I have a "type A" personality; and always planned to work until death.
  - e. According to Social Security Administration (SSA),
    - i. I have another 20.5 years to live.<sup>1</sup>
    - ii. The SSA's data includes "all comers;" so it is reasonable to believe my life expectancy will be greater than 20.5 years.
2. Contract
  - a. Value: \$60,000.00. See Exhibit I.

---

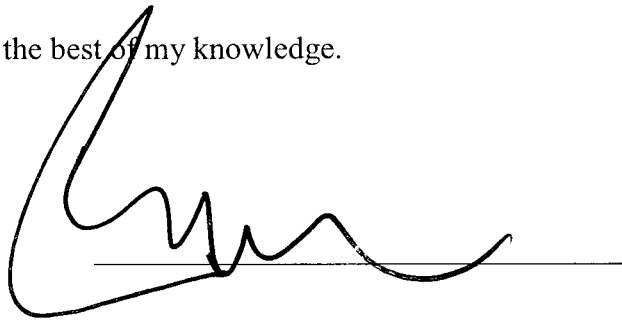
<sup>1</sup> 2017 Actuarial Life Table (most recent year data available); <https://www.ssa.gov/oact/STATS/table4c6.html> (September 1, 2020).

- b. Interest: \$10,000.00, see Exhibit II.
- 3. Attorney fees \$31,750.00 (at present). See Exhibit III and IV.
- 4. Expenses: \$1000.00 (*see* Exhibit III).
- 5. Medical Premiums: \$56,000.00 (*see* Exhibit III).
- 6. Net loss of income (*see* Exhibit III):
  - a. Presently is \$975,036.00.
  - b. If I work to age 70 is \$1,787,566.00.
- 7. Net Thrift Savings Plan losses (*see* Exhibit III):
  - a. Presently is \$500,000.00.
  - b. If I work to age 70 is \$1,787,566.00.
- 8. Lost Federal Employees Retirement System Benefits (*see* Exhibit III):
  - a. Presently is \$111,000.00.
  - b. If I work to age 70 is \$789,000.00.
- 9. Reputational Damages: \$1M (*see* Exhibit III).
- 10. Pain and Suffering \$500,000.00 (*see* Exhibit III).
- 11. Punitive Damages: Depend on the above.
- 12. The total Damages,
  - a. Are itemized in Exhibit V.
  - b. Using the most conservative figures (*see* Exhibit III), the total damage are between \$3.4M and \$6.7M.

[Intentionally Left Blank]

I declare under penalty of perjury under the laws of the United States and Kansas that the foregoing statements are true and accurate to the best of my knowledge.

September 8, 2020



Thomas R. McLean, Plaintiff *pro se*

4970 Park  
Shawnee, KS, 66216  
913-525-5526  
tmcllc1999@gmail.com

Subscribed and sworn to before me  
this 8th day of September, 2020



Maria Victoria Portuguez

Notary Public, Johnson County, KS

My Commission Expires: July 12, 2021

